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December 22, 1994

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William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: ET Docket No. 93-7 - Report of Ex Parte Presentation

Dear Mr. Caton:

Today, representatives of the consumer electronics industry met with Richard Smith and Bruce Franca, Chief and Deputy Chief respectively, of the Office of Engineering and Technology to discuss the above-referenced docket. The consumer electronics representatives were James E. Bonan, Vice President for Home Video Consumer Products Group, Sony Electronics Inc., Stephen E. Sigman, Vice-President for Consumer Affairs, Zenith Sales Company, Edward M. Milbourn, Manager of Television Systems Planning, Television Division, Americas, Thomson Consumer Electronics, David Broberg, Product Engineer and Development Manager, Mitsubishi Electronics America, Roger L. Richards, Senior Member, Technical Staff, TV Product Development, Americas, Thomson Consumer Electronics, George A. Hanover, Staff Vice President - Engineering, Consumer Electronics Group of the Electronic Industries Association, Brian Markwalter, Staff Engineer, Consumer Electronics Group of the Electronic Industries Association, and the undersigned.

The industry representative demonstrated the infeasibility of the use of infrared signals that would be passed through the proposed Decoder Interface on cable-ready television receivers as well as the utility of the industry's proposed command set. The enclosed handout was used in the presentation.

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This letter and the extra copy of this letter are being transmitted in accordance with Section 1.1206(a) of the Commission's rules. Please let me know if you have any questions.

Sincerely,

Jeffrey A. Campbell

Enclosure

cc: Richard Smith
Bruce Franca

The Decoder Interface, a Flexible and Stable Architecture for Future Compatibility

Ex parte presentation by the
Electronic Industries Association
December 22, 1994

Agenda

- Background
- Demonstrations
  - » IR Conflicts
  - » Non-IR Consumer Electronics
  - » Simulation of Decoder Interface
- Conclusions

Introduction

- The Decoder Interface provides an open standardized connection between receivers and set back modules that meets the needs of industry and the intent of the FCC.
  - » Allows separation of security from other functions.
  - » Provides equal access for alternate service providers.
  - » Provides flexibility to accomodate new services.

Current Situation

- The CE industry has negotiated in good faith to maximize the utility of the proposed interface.
- The cable industry continues to add requirements, and currently insists on 'IR pass through'.
- IR pass through is fraught with problems, and simply will not work reliably.
- The C3AG and JEC are unable to finalize the Decoder Interface, due to cable's insistence on 'IR pass through'. EIA's compromise proposal rejected by cable.

The Decoder Interface

- Provides 3 levels of flexibility to accomodate new services
  - » On-screen menuing, including cursor.
  - » 'F' commands, that are defined by the set-back.
  - » 'Mode' command, allowing individual control of multiple set-backs
- These 3 levels support an infinite number of features/services.

The 'Command Set'

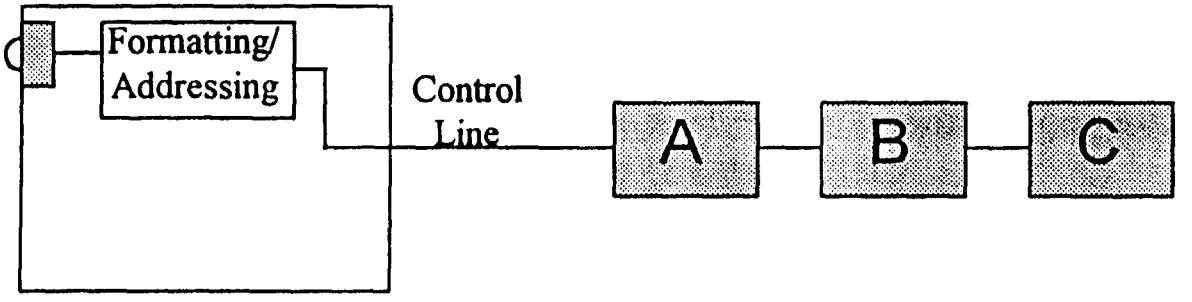
- The 'command set' is *not* the 'user interface'.
- The 'user interface' can be created by the 'set-back'.
- The 'command set' merely provides the tools for any TV or VCR to *operate* the interface.
- The 'command set' is a network protocol that allows multiple devices (TV, VCR, set-back boxes) to operate in a coordinated fashion.

IR Pass Through is a Catastrophe not a Cure

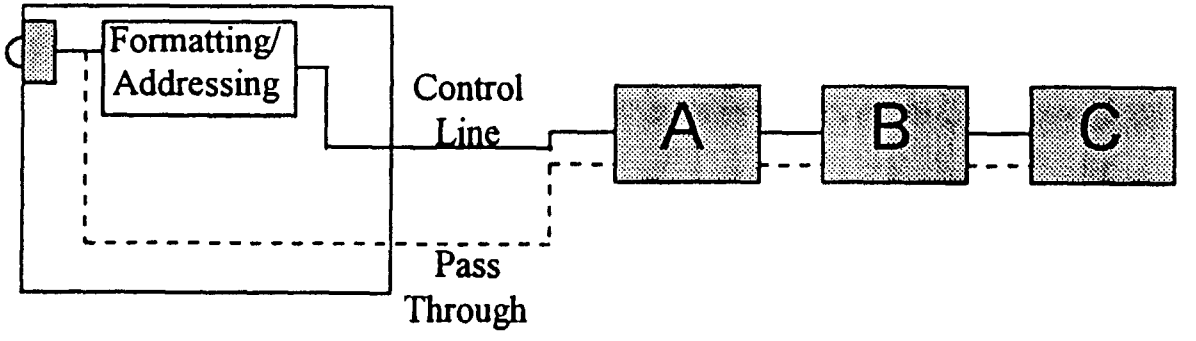
- Clearly the intent of the Cable Compatibility Act is to bring some order to the industry in defense of the consumer
- Pass through subverts this goal by skirting the standardized interface
- This cavalier approach is exactly the kind of problem that the FCC is attempting to rectify!

IR Pass through short circuits the Decoder Interface

Current Decoder Interface



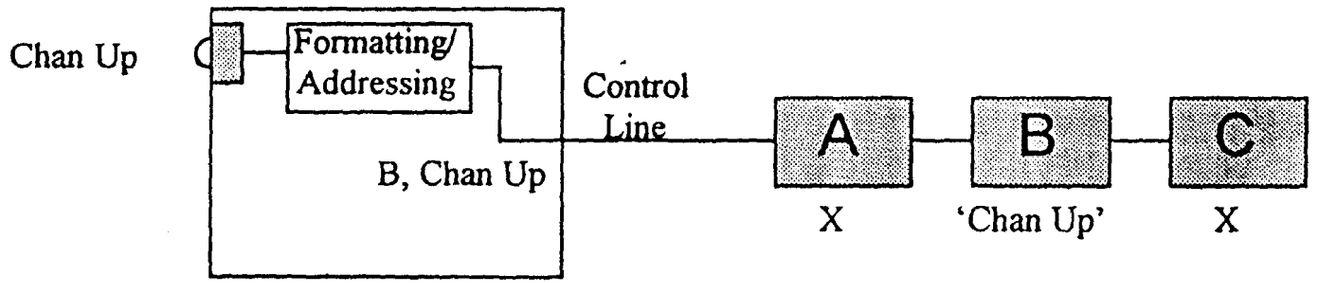
Cable's proposal



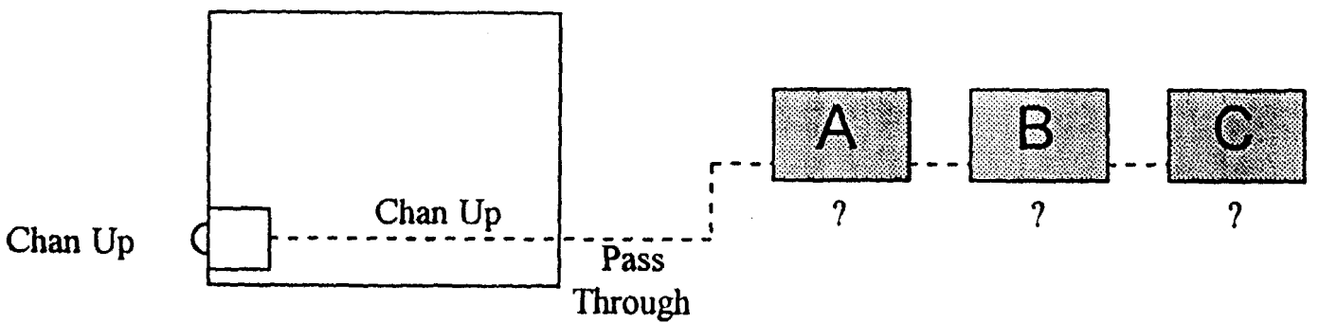
Two conflicting control systems can't work...

IR Pass Through is Unreliable

Current Decoder Interface



Cable's proposal



The Decoder Interface
IR Pass Through is Unreliable

- Creates false triggering with multiple devices connected to the interface
- Conflicts are a problem now and will increase
- IR pass through compounds the conflict problem
- The marketplace cannot resolve conflicts, since set-backs are cable-provided.

IR Pass Through is Unsound

- This vague proposal simply won't work reliably, due to the complexities of IR carriers, detector modules used, and increasing interference
- Cost estimates are unrealistically low - especially for receivers that do not use IR
- In the unlikely event that direct IR access to set-back is desired, it can be achieved simply by adding an IR receiver to the set back.

The Decoder Interface Provides an Effective Solution

- The result of fixing all the problems with IR pass through is the Decoder Interface already developed by the JEC!
- The expense, confusion, conflicts, and consumer dissatisfaction of IR pass through can be avoided simply by exercising the potential of the Decoder Interface.

Flexible by Design

- Commands available on the Control Line offer all of the tools to access ANY service provider's user interface supplied in their decoder or feature box.
- These commands include digits, Enter, transaction commands, menu navigation, VCR control, program guide control, channel up/down, and 12 undefined commands.

Demonstrations

- IR Conflict
  - » Zenith TV responds to Sony VCR codes.
  - » Others exist - even among cable boxes
- 'High Tech' remotes don't use IR
  - » 'VisionTouch' receiver
- Flexibility of current DI command set
  - » PC Simulation

Negotiating in Good Faith

- The CE Industry has worked to understand the needs of cable operators
- Many, many concessions have been made over the last year, culminating in our last proposal made to the cable caucus
- We have attempted to resolve conflicts within the bounds of the Decoder Interface (parity of access for all service providers and potential feature modules)

Our Proposal

- Meets the spirit of the FCC intent and the goals of service providers (including cable), without IR pass through problems
- Offers a 'Guide' command to provide direct access to program guides.
- Offers a 'Mode' command to give parity of access to service providers.
- Provides 12 'F' commands that are completely definable (and reusable) for any and all unforeseen services

Our Proposal

- Offers 'VCR Stop' command to complete CE's previous offer to allow cable to control VCR record operations
- Offers to allow the set back box to turn on the TV's tuner while the TV is off so cable can transmit data through the TV. This concession adds significant cost and puts us in conflict with DOE desires to reduce power.
- Offers to utilize a standardized technique to download channel maps to the receiver and withdraw opposition to channel mapping

Our Proposal Asks of Cable Only

- that cable limit channel mapping to technically necessary situations
- that the command set be adopted so that work can continue
- that IR pass through be dropped

Cable Refused!

Conclusions

- Engineering committees are ready to continue work and begin a testing program.
- The Commission needs to remove IR pass through from the agenda.
- Let us build prototypes to evaluate the design.